

**ONTARIO
SUPERIOR COURT OF JUSTICE
(East Region)**

IN THE MATTER OF an Application by the Attorney General for Ontario for an order restraining monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker fundraising campaign pages hosted by GiveSendGo pursuant to section 490.8 of the *Criminal Code*.

BETWEEN:

HER MAJESTY THE QUEEN

Applicant

And

**GIVESENDGO
FREEDOM 2022 HUMAN RIGHTS AND FREEDOMS
CHRIS GARRAH**

Respondents
(*ex parte*)

NOTICE OF APPLICATION

APPLICATION IS HEREBY MADE by the Attorney General for Ontario, through his counsel, in writing to a Judge of the Ontario Superior Court of Justice located at 161 Elgin Street, Ottawa, Ontario, for a Restraint Order pursuant to section 490.8 of the *Criminal Code* in respect of the following property:

Any and all monetary donations made through the Freedom Convoy 2022 and Adopt-a-Trucker fundraising campaign pages hosted by GiveSendGo (www.givesendgo.FreedomConvoy2022, www.givesendgo.com/Warroomcanadanet, respectively), including monetary donations which have been transferred by GiveSendGo or its third-party payment processors to the benefit of the campaign recipients as named on the said campaign pages, being “Chris Garrah” and “Incorporated Freedom 2022 Human Rights and Freedom Association”, or to the company “Freedom 2022 Human Rights and Freedoms” (Canadian corporation number 1372685-1).

[the property]

THE GROUNDS FOR THIS APPLICATION ARE:

1. That there are reasonable grounds to believe the property is offence-related property;

2. An order pursuant to section 490.8(3) may be issued in respect of property situated outside Canada; and
3. Such further and other grounds as counsel may advise and this Honourable Court may permit.

IN SUPPORT OF THIS APPLICATION, THE APPLICANT RELIES ON THE FOLLOWING:

1. Affidavit of Christopher Rhone sworn February 10, 2022; and
2. Draft Restraint Order

THE RELIEF SOUGHT IS:

1. That a Restraint Order be made in respect of the property described above.

Dated at Toronto, Ontario on February 10, 2022.



Randy Schwartz
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